## IN THE UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

THOMAS GORCZYNSKI, Individually and on behalf of others similarly situated,

Case No. 1:18-cv-10661-RMB-AMD

Plaintiff,

v.

AMENDED
CERTIFICATION OF DANIEL E.
GUSTAFSON, ESQ. IN SUPPORT OF
APPLICATION FOR PRO HAC VICE
ADMISSION

ELECTROLUX HOME PRODUCTS, INC., et al.,

Defendants.

## **DANIEL E. GUSTAFSON**, of full age, certifies as follows:

- 1. I am a founding member of the law firm Gustafson Gluek PLLC, located at Canadian Pacific Plaza, 120 South Sixth Street, Suite 2600, Minneapolis, MN 55402. I respectfully submit this Certification in support of my application for admission *pro hac vice* to this Court pursuant to Local Civil Rule 101.1 on behalf of Plaintiff Thomas Gorczynski, individually, and on behalf of all others similarly situated (the "Plaintiffs") in the above matter.
- 2. As required under Local Civil Rule 101.1(c), I am a member in good standing of the bar of the State of Minnesota and was admitted to practice in that jurisdiction on October 27, 1989. (A copy of my Certificate of Good Standing, dated January 16, 2020, from the State of Minnesota is attached as Exhibit A).
  - 3. I am also a member in good standing with the following additional courts:
    - the United States District Court for the District of Minnesota:

Admission date: 12/19/1990

Contact information: Diana E. Murphy United States Courthouse,

300 South Fourth Street - Suite 202,

Minneapolis, MN 55415 Telephone: 612-664-5000

E-mail: <a href="mailto:ecfhelpdesk@mnd.uscourts.gov">ecfhelpdesk@mnd.uscourts.gov</a>

the United States District Court for the District of North Dakota,

Admission Date: 4/25/2012

Contact Information: William L. Guy Federal Bldg.

U.S. Courthouse

220 East Rosser Ave. #476 Bismarck ND 58501-3869 Telephone: (701) 530-2300

• the United States District Court for the Eastern Division of Michigan,

Admission Date: 10/2/2012

Contact Information: Theodore Levin U.S. Courthouse

231 W. Lafayette Blvd. Detroit, MI 48226

Telephone: (313) 234-5005

• the United States District Court for the Western District of Michigan,

Admission Date: 08/18/2006

Contact Information: Thomas L. Dorwin Clerk of Court

399 Federal Building 110 Michigan NW

Grand Rapids, Michigan 49503

Phone: (616) 456-2381

• the United States District Court for the Eastern District of Wisconsin:

Admission Date: 6/8/1999

Contact Information: United States Federal Building and Courthouse

517 E. Wisconsin Ave. Rm. 362

Milwaukee, WI 53202 Telephone: (414) 297-3372

E-mail: wied\_clerks\_milw@wied.uscourts.gov

• the United States Courts for Appeals for the First Circuit (Bar No. 1036571),

Admission Date: 6/13/2014

Contact Information: Office of the Clerk

U.S. Court of Appeals

U.S. Courthouse

1 Courthouse Way, Suite 2500

Boston, MA 02210

Telephone: 617-748-9057

• the United States Courts for Appeals for the Second Circuit,

Admission Date: 6/24/2019

Contact Information: U.S. Court of Appeals for the Second Circuit

**Attorney Admissions** 

Thurgood Marshall United States Courthouse

40 Foley Square New York, NY 10007 Telephone: 212-857-8603

• the United States Courts for Appeals for the Third Circuit,

Admission Date: 3/25/2009

Contact Information: U.S. Court of Appeals

Third Circuit

21400 U.S. Courthouse 601 Market Street Philadelphia, PA 19106 Telephone: (215) 597- 2995

E-mail: attyadmissions@ca3.uscourts.gov

• the United States Courts for Appeals for the Sixth Circuit,

Admission Date: 6/5/2015

Contact Information: U.S. Court of Appeals for the Sixth Circuit

Office of the Clerk

540 Potter Stewart U.S.Courthouse

100 E. Fifth Street

Cincinnati, Ohio 45202-3988 Telephone: (513) 564-7000

• the United States Courts for Appeals for the Eighth Circuit

Admission Date: 8/15/1995

Contact Information: Federal Court Building

316 North Robert Street

Room 500

St. Paul, MN. 55101

Telephone: (651) 848-1300

• the United States Court for Appeals for the Eleventh Circuits,

Admission Date: 1/9/2001

Contact Information: US Courts of Appeals

Eleventh Circuit

56 Forsyth Street, N.W. Atlanta, Georgia 30303 Telephone: (404) 335-6122

• the United States Supreme Court;

Admission Date: 5/30/1995

Contact Information: Clerk, Supreme Court of the U.S.

ATTN: Admissions Office One First Street, NE Washington, DC 20543 Telephone: 202-479-3000

- 4. I am not under suspension or disbarment by any court.
- 5. My firm and I have been requested by Plaintiffs to represent them in connection with this litigation because I have substantial experience in civil litigation, including consumer law and class action litigation. I believe that my expertise makes me particularly qualified to represent Plaintiffs and a class of similarly situated individuals.
- 6. I am associated in this matter with the New Jersey law firm of Saltz, Mongeluzzi & Bendesky, PC and Simon Bahne Paris, Esq. of that firm, who is admitted to practice law in the State of New Jersey and this Court.
- 7. I designate the following member of the Bar of this Court with whom the Court and opposing counsel may communicate regarding this case: Simon Bahne Paris, Saltz, Mongeluzzi & Bendesky, PC, One Liberty Place, 1650 Market Street, 52<sup>nd</sup> Floor, Philadelphia, PA 19103. I shall have all pleadings, briefs, and other papers filed with the Court signed by an attorney of record authorized to practice in this State.
- 8. No delay in discovery, motions, trial, or any other proceeding shall occur or be requested by reason of my inability to be in attendance.
- 9. I agree to strictly observe the dates fixed for scheduling conferences, motions, briefs, pre-trial conferences, trial, or other proceedings.
- 10. If admitted *pro hac vice*, I will adhere to the disciplinary jurisdiction of this Court. I also consent to the appointment of the Clerk of the Supreme Court of the State of New Jersey as agent upon whom service of process may be made for all actions against me or my law firm that may arise out of my participation in this matter.

11. I will arrange with the New Jersey Lawyer's Fund for Client Protection for

payment of the applicable annual fee and shall pay the \$150.00 fee required by Local Civil Rule

101.1(c)(3) upon my admission *pro hac vice*.

12. I shall notify this court immediately of any matter affecting my standing at the bar

of any other court.

13. Should the Court grant this application to appear *proc hac vice*, I will abide by all

the requirements outlined in Local Civil Rule 101.1(c).

14. I therefore respectfully request that the Court grant my application for *pro hac* 

vice admission in this matter.

I certify that the foregoing statements made by me are true. I am aware that if any of the

foregoing statements made by me are willfully false, I am subject to punishment.

Dated: September 22, 2020

Daniel Gustafson

**Gustafson Gluek PLLC** 

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Fax: (612) 339-6622

dgustafson@gustafsongluek.com

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